

Exhibit 39

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., No. 16-cv-07853
Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937
Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663
Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00117
Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450
Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651
Abarca, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887
Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908
Abedhajajreh, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-06123
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-07914
Abbate, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-08617

DECLARATION OF EVAN F. KOHLMANN

I, Evan F. Kohlmann, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a private International Terrorism Consultant who specializes in tracking al-Qaida and other contemporary terrorist movements.
2. I have been retained as an expert witness by Plaintiffs in connection with this matter.
3. I am over the age of eighteen years old and am not a party to this action. I am personally familiar with the facts set forth herein, unless stated otherwise.
4. I make this declaration in support of Plaintiffs' Averment of Jurisdictional Facts and Evidence and/or Statement of Facts Pursuant to Rule 56.1, in support of Plaintiffs' claims against Al Rajhi Bank.
5. A true and correct copy of my expert report dated October 4, 2023 is being submitted in support of Plaintiffs' Averment of Jurisdictional Facts.

6. If called as a witness at trial or another proceeding, I will testify under oath as to the conclusions and support in my expert report.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

March 6, 2024

Date



Evan F. Kohlmann